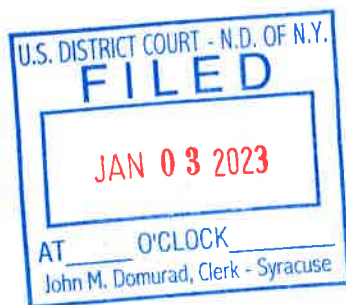


Jane Doe  
*The Plaintiff*



December 28, 2022

**VIA**

Honorable Thérèse Wiley Dancks  
United States Magistrate Judge  
United States District Court, Northern District of New York  
100 S. Clinton Street  
Syracuse, NY 13261

Re: Jane Doe v. Syracuse University  
Case No.: 5:18-cv-01100 (BKS-TWD)

Dear Judge Dancks:

On November 19, 2018 (Docket 11), you entered a protective order "allowing Jane Doe and Student X to proceed using pseudonyms" and making clear that the "Parties should make every effort to redact identifying information for Court filings,"

On December 27, 2022 (Docket 72), Defendant filed a letter request/motion that violated the protective order in multiple ways. It attached unredacted documents that repeatedly identified me by name. It left unredacted my email address. And it did so in the context of a filing that included discussions of my medical and counseling history, matters of utmost sensitivity. [Exhibit A]

The document remains publicly available on PACER and also is publicly available on CourtListener ([https://www.courtlistener.com/docket/7888354/doe-v-syracuse-university/?order\\_by=desc](https://www.courtlistener.com/docket/7888354/doe-v-syracuse-university/?order_by=desc)), suggesting that at least one member of the public or the media has accessed it.

Given the brazen nature of Defendant's violation, it is hard to see it as anything other than intentional or reckless.

Accordingly, the Plaintiff request:

- (1) that the letter request/motion at Docket 72 be sealed; and
- (2) that the court impose appropriate sanctions on Defendant for violating the protective order.

Thank you.

Respectfully,

Jane Doe  
*The Plaintiff*

# **EXHIBIT A**

BARCLAY DAMON LLP

Edward G. Melvin  
Partner

December 27, 2022

**VIA CM/ECF**

Honorable Thérèse Wiley Dancks  
United States Magistrate Judge  
United States District Court, Northern District of New York  
100 S. Clinton Street  
Syracuse, NY 13261

Re: **Jane Doe v. Syracuse University**  
**5:18-cv-1100 (BKS) (TWD)**

Dear Judge Dancks:

Our office represents the Defendant, Syracuse University ("Defendant"), in the above-referenced matter.

We write to request the Court's assistance in resolving a discovery dispute with the Pro Se Plaintiff ("Plaintiff") in this matter.

We originally served our Interrogatory and Document demands ("Demands") to the Plaintiff on July 28, 2022, and requested a response within 30 days. The email containing those demands is attached here as **Exhibit A** and the Demands are attached as **Exhibit B**. Both parties later agreed to extend the deadline for answering our respective demands to September 28, 2022.

On September 28 and 29, 2022, Plaintiff responded ("Responses") to the Demands, attached here as **Exhibit C**. In those Responses, Plaintiff objected to most of the Demands, often without explanation or justification. Defendant then responded with follow-up demands, narrowing its requests for information rather than asking for Plaintiff to answer each demand to which she objected. Defendant instructed Plaintiff to respond within two weeks, by November 23, 2022. A copy of Defendant's deficiency letter ("Deficiency Letter") is attached as **Exhibit D**.

On December 7, two weeks after the deadline to respond, Plaintiff responded to Defendant's Deficiency Letter. A copy of Plaintiff's response is attached here as **Exhibit E**. Once again, Plaintiff objected to most of Defendant's demands or otherwise did not provide complete answers. On December 15, Defendant responded to Plaintiff's December 7 letter, requesting that she provide documents for four specific demands that she had refused to answer since they were originally served on July 28. Defendant provided Plaintiff with one week, by December 22, within which to respond. A copy of Defendant's December 15 email is attached as **Exhibit F**. Plaintiff has yet to reply.

Despite Defendant's numerous efforts to resolve the discovery dispute with Plaintiff in good faith, she has continuously failed to provide the requested documents. Specifically, Defendant seeks:

- (1) all documents concerning applications and rejections related to Plaintiff's efforts to enroll in any college, university, or other institution of higher learning from September 15, 2015, to date, which is relevant to this lawsuit in light of the fact that Plaintiff is claiming she has lost educational and academic opportunities due to Defendant's actions;
- (2) all documents concerning applications and rejections related to Plaintiff's efforts to secure employment since Plaintiff's expulsion from Syracuse University, which is relevant to this lawsuit in light of the fact that Plaintiff claims she lost employment opportunities due to Defendant's actions;
- (3) all tax returns, wage and tax statements, and paystubs from 2015 to the present, which is relevant to this lawsuit in light of the fact that Plaintiff claims she lost employment opportunities and incurred other financial damages due to Defendant's actions;
- (4) all documents concerning Plaintiff's alleged reputational damage and diminished career opportunities, which she has claimed is due to Defendant's actions.

We respectfully request the Court's assistance in resolving this discovery issue. The discovery deadline is January 17, 2023, and we've asked Plaintiff to confirm her availability for her deposition on January 10, 2023 (pending receipt of the outstanding information).

Thank you.

Respectfully,

*s/Edward Melvin*

Edward G. Melvin  
Bar Roll No. 509037

EGM:prh  
cc Jane Doe (e-mail)

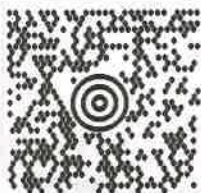


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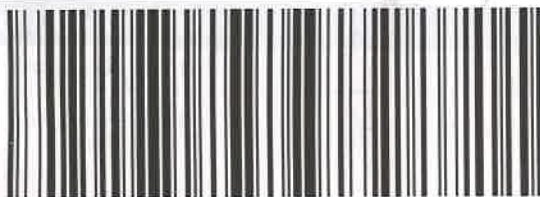


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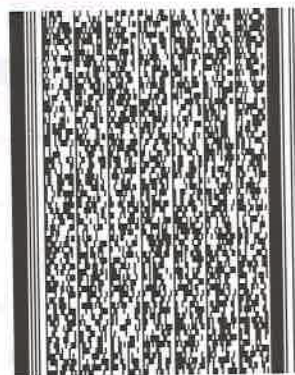
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